

GRECO ♦ NEYLAND, PC

ATTORNEYS AT LAW

April 4, 2016

Hon. Jonathan W. Feldman
United States Magistrate Judge, WDNY
100 State Street
Rochester, NY 14614

Via ECF

Re: United States v. Jose Gonzalez, 15-cr-06037-FPG, Leave to File Motions

Dear Judge Feldman,

We represent Jose Gonzalez in the above-referenced matter. We write this letter to request leave to file motions in this case. Currently, motions are due on April 5, 2016. We are requesting an additional thirty (30) days from April 5, 2016 to file motions, so that our motions would be due on May 5, 2016.

The reason for this request is that we have only recently received from the Government a video that appears to be a key piece of evidence, and we have some investigation to do surrounding that video before we file motions. We have spoken with Assistant United States Attorney Robert Marangola about this request, and he has no objection to this request so long as we agree that this time is excludable for the purposes of the Speedy Trial Act.

We had attempted to speak with AUSA Marangola last week, but unfortunately he was out of the office. If this request is granted, defense consents to excluding the additional requested time to file motions.

The Court's time and attention to this matter are greatly appreciated. Please do not hesitate to contact me with any questions, comments, or concerns.

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Respectfully submitted,

/s/ Jeffery L. Greco

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